

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

INIGO RUMAYOR

Plaintiff,

v.

Case No.: 23-cv-09280 (PAE)

MASTERCARD INTERNATIONAL INC.

Defendant.

**JOINT MOTION TO STAY ALL DEADLINES**

**VIA ECF**

Hon. Paul A. Engelmayer  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Dear Judge Engelmayer:

The parties submit this letter to seek a stay of all deadlines in this case.

The current schedule is set forth in the Court's Order granting the parties' joint motion to modify the scheduling order (ECF Nos. 34 and 35) and includes a fact discovery deadline of July 12, 2024.

Since issuance of that Order, the parties have reached an agreement in principle on the key terms of a settlement. The parties are currently working together to memorialize and finalize that settlement. Accordingly, the parties respectfully seek this stay to conserve their resources and those of the Court. The parties propose that the stay continue until either party seeks to lift the stay or the case is dismissed.

Dated: June 27, 2024

Respectfully submitted,

/s/ Daniel Rosenthal

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By: /s/ Mary A. Smith  
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Kevin W. Murray

*Attorneys for Defendant*

The Court appreciates the notification. However, per its usual practice, the Court will issue a separate order dismissing the case without prejudice to the right to reopen it within 60 days if the settlement is not consummated.

SO ORDERED.

*Paul A. Engelmayer*

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PAUL A. ENGELMAYER  
United States District Judge  
July 2, 2024